PORSF 11.3.40.1 v.1
8/15/08

LAKESIDE INDUSTRIES
Response to First Request for Information
Portland Superfund Site

Section 1.0 Respondent Information

1. Lakeside Industries
P.O. Box 7016
Issaquah, WA 98027

2. a. to d. Forest Lane, Environmental Program Director
(425) 313-2656 ForestL@LakesideInd.com

Jock Hatch, Director of Permits & Land Use Planning
(425) 313-2660 JockH@LakesideInd.com

Kimberly Milan, Executive Assistant
(425) 313-2639 KimberlyM@LakesideInd.com

All contacts at: 6505 226th Place SE
P.O. Box 7016
Issaquah, WA 98027
Fax (425) 313-2631

3. Forest Lane
Lakeside Industries
P.O. Box 7016
Issaquah, WA 98027
(425) 313-2656 ForestL@LakesideInd.com
Fax (425) 313-2631

Section 2.0 Owner/Operator Information

4. Lakeside Industries – Portland Plant

Oregon Dept of State Lands – Waterway Lease

5. Lakeside Industries-Portland Asphalt Plant
Property purchased 1/7/1987 by Washington Asphalt
Quit Claim Deed to Lakeside 3/6/1995

4850 NW Front Street
Portland, OR 97210
Tax ID #'s: [redacted], [redacted]

Oregon Dept of State Lands-Waterway Lease #ML 4868
1/1/97 to present

For barge access & tie up
Described as follows:

All state-owned submerged and submersible lands in the Willamette River in Section 19, Township 1 North, Range 1 East, Willamette Meridian, Multnomah County, Oregon, more particularly described as follows:

Commencing at a point on the intersection of the West line of Tax Lot 112 (Multnomah County Assessor's Map Number 1-1-19) and the line of Ordinary High Water on the left bank of the Willamette River;

thence riverward along a line perpendicular to the thread of the stream to the line of Ordinary Low Water;

thence upstream along the line of Ordinary Low Water 200 feet, more or less, to the TRUE POINT OF BEGINNING;

thence riverward along a line perpendicular to the thread of the stream 250 feet;

thence upstream and 250 feet parallel to said line of Ordinary Low Water 200 feet;

thence shoreward along a line perpendicular to the thread of the stream 250 feet to the line of Ordinary Low Water;

thence downstream along said line of Ordinary Low Water 200 feet, more or less, to the TRUE POINT OF BEGINNING, containing 1.15 acres, more or less.

6. a. Lakeside Industries
   b. NONE
   c. Shaver Transportation – leases space for barge(s)
   d. Portland General Electric – 5/22/55, Book 1785 Page 130
   e. None
   f. Chuck Gaskill
   g. "
   h. "
   i. None
7. Purchased parcels R941191120 & R9419130 from Shaver Transportation in January 1987
   Purchase Docs – See Section 1
   Lease Docs – See Section 2
   a. None
   b. None
   c. None
8. No
9. No
10. Shaver Transportation
   a. Owned from: Unknown to January 1987
   b. Unknown
   c. Unknown
11. Shaver Transportation

a. Unknown
b. Unknown
c. Unknown
d. Unknown
e. Unknown

12. N/A

Section 3.0 **Description of Each Property**

13. a. Legal description enclosed – See Attachment 1

b. Sanitary sewer shown on site map – See Attachment 31
City of Portland conducted dye tracer tests and determined there have never been any storm sewer connections from the site to City storm sewer on Front Street . See City of Portland Letter – Attachment A. As far as we know, storm water has never discharged to the river. This site is generally flat with a slight slope (about 0.3%) from west to east. It does not have any significant slope to the north towards the river, although historically it could have drained large storm events into the river. In 1987, Lakeside Industries channeled all storm water into two dry wells or Underground Injection Control (UlC). When dry wells were removed in 2005, storm sewer was inadvertently connected to sanitary sewer and remains connected in this manner awaiting city guidance.

c. N/A
d. See site maps – Attachment 31
e. One dock – See Attachment 31
f. Lakeside has been operating with 2 Underground Injection Control (UlC) devices to handle all storm water on site. UlC #1 located near Front St. and above ground storage tank. Received drainage generally from the south and west end of site. UIC #2 is located off of NW comer of truck shop and receives storm water drainage from the North & East portions of the property. When Lakeside undertook UIC closure investigations in 2004, four additional former UIC locations were identified-P7, P8, P9, P10-Item 31). However upon further investigation these drywells were not physically found. See Attachment 23.
g. NA
h. In 1999 in conducting a remedial investigation for Gunderson, Squier Associates installed five monitoring wells on Lakeside property to monitor the extent in movement of underground TCA contaminant plume. MW43, MW44, MW46, MW50, MW51 – See Attachment 31
MW46 was later closed because it interfered with flow of Lakeside's business. In conducting the UIC investigation Lakeside installed MW1, MW2, MW3 and MW4 near UIC #1 as a means to assess potential groundwater contamination. Additionally, soil borings PI thru PI0 were conducted at location shown on Attachment 31.
i. See 13b,f,h
j. See 13f

k. See 13 b
l. See Attachment 31
m. See attached photo – Attachment 31

14. See Attachment 31, open source docs & ordinary high water mark
15. See 3.0-13m, attachments and open source docs
16. a. N/A
b. N/A
c. N/A
d. N/A
e. N/A
f. N/A
g. N/A
17. N/A
18. a. See Attachment 31
b. Unknown
c. Unknown
d. Unknown
e. See attached map –Attachment 31
19. See attached Stormwater Prevention Plan, Spill Plan & NPDES Permit – Attachment 29

Section 4.0 **Respondent's Operational Activities**

20. In 1987, Red Samm Mining Company Inc, (dba Lakeside Industries) purchased the site at 4850 Front Street and developed it as a manufacturing site for Hot Mix Asphalt (HMA) pavement. The manufacturing of HMA (95% crushed rock and 5% asphalt cement) is an uncomplicated, simple process: The crushed rock is heated and dried by tumbling it in a drum dryer. Subsequently, it is mixed with hot asphalt cement in a self-contained, enclosed, automated drum-mixer attached to the drum dryer. The design of this drum-dryer/mixer (Gencor Uhradrum) allows the "blue smoke" emissions to be consumed in the dryer flame and permits crushed Recycled Asphalt Pavement (RAP) to be added back into the mix without increased emissions. The air flow from the aggregate dryer is ducted through a baghouse filtering are where dust is removed before exhaust release to the atmosphere. The crushed aggregate is delivered to the facility by barge, and unloaded and stockpiled by one of three conveyor systems. The RAP is delivered to the facility by truck where it is crushed and screened in preparation for adding to the hot mix. The asphalt cement is delivered to the facility 'hot' (about) 325° Fahrenheit [F]) by tanker truck and stored in one of two heated (about 325° F), contained tanks. After the mixing of hot aggregate and asphalt cement, the hot asphalt concrete is moved by drag conveyor to one of three insulated silos (hoppers) and then directly loaded into open dump trucks for transport and immediate use at the paving site. It must be laid down and compacted before cooling. Lakeside maintains a fleet of 15 asphalt dump trucks and approximately 12 pieces of paving equipment. Vehicle maintenance is conducted onsite in an enclosed maintenance building and vehicle refueling

occurs from a contained above ground fuel tank. Except for the riverfront portion of the property, the site is surrounded by a fence with gates that are locked and secured when the Facility is closed.
From 1987 to 1995, a semi-dry mixture of aggregate and Portland Cement called Concrete Treated Base (CTB) was also manufactured at low volumes. After 1995, the demand for this product dropped significantly and CTB was produced sporadically and in small quantities until 2004. Subsequently, it ceased all production activities. I was dismantled in 2008.

Inasmuch as the ODEQ Strategy Recommendation (Appendix A), page 3, second paragraph of the Operational History misrepresents the Facility and operations, the following comments are included to more clearly represent the Facility operators' description of the Facility operations, equipment and processes:

1. The Facility has not and does not operate a concrete treated base (CTB) *crusher*; it has not and does not operate a *recycling and reclamation plant* (although it does recycle some pavement); the product is not called a *wet mix*; RAP does not include *asphaltic shingles*; neither waste asphalt nor RAP is off-loaded dockside and stored adjacent to the river; and there is no *hot melt process* involved in any of the operations.

2. Although the facility does manufacture two products: hot-mix asphah (HMA) concrete and CTB, both of these products use virgin crushed aggregate which is off-loaded dockside and stockpiled adjacent to the river. This material is clean crushed rock without any aduherations.

3. HMA is manufactured by heating and drying the aggregate in a drum dryer, and then adding about 5% asphah cement in a separate chamber from the burner so there is no asphalt burning. Consequently, there is no asphalt smoke or fume emitted from the stack. The resulting mixture is conveyed to an insulated silo and loaded into trucks for transport to the paving site. RAP is added at the same time as the asphalt cement so it is away from the burner and does not get burned, either. Typically, the Facility incorporates about 20% RAP into the finished product, when specifications permit or require it. RAP is broken up on-site with a crusher, which breaks it into smaller pieces.

4. CTB is mixed at ambient temperatures and is a simple mixture of crushed aggregate, water and dry Portland cement. It looks like damp crushed gravel and is carried in open dump trucks.

21. Yes. Lakeside retained Safety Kleen to provide solvent for parts washing.

Spent solvent was regularly removed by Safety Clean. In 1998, Lakeside began using a closed-loop cleaning system where solvent is filtered and reused – no waste was generated.

a. In general terms, Lakeside used a solvent provided by Safety Kleen to wash parts in Safety Kleen washer trays. Safety Kleen would come monthly to remove spent solvent for recycle and replace with clean solvent. This would generate about 172 to 220 lbs (23-33 gal) of solvent per month. Lakeside first reported to DEQ as a Small Quantity Generator (SQG) in 1991 and in subsequent years until 1995. Then from 1996 to 1998 Lakeside reported as a Conditionally Exempt Generator (CEG) meaning we generated less than 220 lbs or 33 gallons for every month during that calendar year. In 1999 Lakeside ceased using Safety Clean and began to use a filterable solvent which is continuously reused. In the Hazardous Waste Generation Report for 1999, Lakeside reported to DEQ that we were no longer generating solvent waste.

b. Petroleum Naphtha, liquid.

c. Petroleum Naphtha was provided by contract from Safety Kleen. After use, spent solvent would be removed by Safety Kleen for recycle or disposal.

d. See 21.a. above for generated hazardous waste. Using the more expansive definition of hazardous substance from the Community Right to Know and the Hazardous Substance Information Survey (annually submitted to the Office of State Fire Marshall, the following substances are reported annually: Antifreeze – Ethylene Glycol, 200-500 gal; Asphalt Oil (Hot) 65,000 gal; Diesel Fuel 15,000 gal; Motor Oil: 2,000 gal; Propane: 500-1000 gal; Waste Oil: 500- 1,000 gal (see TAB 2X)

22.

Activity	Hazardous?	Material	Discharged? Spilled? Disposed? Dropped? In Willamette R?
Asphalt Pavement Production	NO		NO
Recycled Asphalt Crushing	NO		NO
Truck Loading	NO		NO
Shop Maintenance	YES	petroleum naphtha	NO
Laboratory Quality Control Testing	YES*	TCE	NO

Hazardous Materials/Waste as described in the table are those substances defined in 40 CFR, Part 261.3. Please refer to Attachment C for additional information.

*TCE was used indoors in Laboratory Quality Control Testing until 1990.

23. Lakeside unloads clean mineral aggregate from barges to be used in production of HMA. Please see table 1., No. 22. Front loader on barge

loads aggregate into hopper from which it is moved via electrical conveyor belts to storage piles on site for subsequent asphalt concrete production. No ships are berthed or anchored, fueled, built, maintained, or retrofitted at the Lakeside site.

24. Lakeside does not lease any aquatic land.
25. No pesticides/herbicides are used on the site.
26. Prior to 1998, minor amounts of waste Petroleum Naphtha were transported off-site by materials contractor, Safety Kleen. See 21 above.
27. a. No.
    b. N/A
    c. N/A
    d. N/A
    e. N/A
    f N/A
    g. N/A
    h. N/A
    i. N/A
    j. N/A
    k. N/A
    l. N/A
28. The property contains a Hot-mix Asphalt plant, a Recycled Asphah Pavement (RAP) crusher, and a combination administrative/shop building. Prior to 2007 site contained a Concrete Treated Base (CTB) plant.
29. See response to question No. 20, also see Attachment 9, (Preliminary Site Assessment dated 7 December 2001)
30. a. 1987 to Present
    b. Production of HMA mix as described in detail in response No. 20 and associated shop activities. As detailed in question 20 above, CTB was produced from 1987 until 2004.
31. The nature and size of the asphalt manufacturing operations and ancillary functions such as vehicle and equipment maintenance, has remained essentially the same from 1987 to present (minor changes have been made e.g. stockpile locations, etc). As detailed in question 20 above, CTB was reduced in 1996 and ceased altogether in 2004.
32. Raw materials used for hot-mix asphalt are asphalt cement and crushed mineral aggregate. When available, Recycled Asphalt Pavement (RAP) can be added to the hot-mix in quantities of up to 25% of the hot-mix produced. RAP is delivered to the site as crushed or crushed and partially broken pavement. It is crushed on site and loaded into a feeder bin where it is metered back into the mix. The use of RAP produces environmental benefits and savings across the whole spectrum: it replaces mining and processing of virgin aggregate; it replaces the extraction and processing of crude oil; it reduces the emissions of criteria pollutants during the manufacturing process; it saves landfill space for more appropriate materials.
33. MSDS's for Asphah Cement, truck bed release agent (surfactant) called

Maxi-Kreme are attached

34. a. Maxi-Kreme biodegradable release agent is used to prevent hot-mix from sticking to truck beds and to clean equipment.
    b. 880 GALS/YR –Average last 5 years
    c. Minor amounts of oil and fuel are occasionally dripped or spilled in small quantities.
    d. Absorbent "kitty litter" material is used for pavement and shop floor cleanup, a shovel and bucket is used for minor spill and drips on gravel areas. Minor spills and drips in stormwater puddles or containment vessels are cleaned up with absorbent pads or booms.
    e. If spilled on the shop floor or outside on pavement, the material is routinely swept up using an absorbent "kitty litter" material and placed in a labeled bin or drum for eventual disposal by a certified contractor (along with used oil filters and rags). Any minor spills or drips on unpaved gravel areas are routinely picked up with a shovel and stored in labeled drums for subsequent disposal. Minor spills and drips in stormwater puddles or containment vessels are cleaned up with absorbent pads or booms.
    f The absorbent "kitty litter" material and absorbent pads and booms are (if not more than half saturated) placed in a bag and placed in the dumpster. If the absorbent material is dripping or more than 50% saturated they are placed in labeled bins or drums for eventual disposal by a certified contractor (along with used oil filters and rags). The minor spills or drips on unpaved gravel which are stored in labeled drums, are periodically added to the aggregate for passing through the drum dryer and ultunate incorporation into the hot-mix asphah.
    g. There is no underground injection performed in the service bays. The service bay contains one long service trench from which the mechanics have access to work on the underside of vehicles and equipment. Near the center of the service trench is an oil sump. Normally, when oil is removed from a vehicle, it is pumped directly to a used oil tank via a suction pump in the tank. However, any material that is spilled in the service trench, runs into the sump. It remains there until a specified quantity is reached (determined by float switch) and it automatically pumps out the sump to the used oil tank. Under ground injection activities have never been part of the shop service trench facility.

35. Same techniques as described in question 34 a –g.

36. During production of hot-mix asphalt, the strong flow of air through the drum dryer (about 50,000 dscf/min), causes the fine mineral grains in the aggregate to become airbome. The baghouse is continuously fihering this sih and clay from the exhaust stream. Depending on the amount of fines and mix design, much of this material can be retumed and incorporated back into the hot-mix. However, if there are more fines than can be effectively used in the mix, they are removed from the production process, wetted with water to keep the dust down and set aside for later haul East County Materials in Yacolt, WA. This material has been tested for VOC and Metals and is considered inert. See documentation at Attachment 30.

a. Dense mud with the consistency of soft modeling clay.
b. Solid. Composition is tiny grains of various minerals that are present in the rocks from which the material was originally eroded or crushed. Material is clean and sterile, having passed through the drum dryer.
c. Generally a dull tan or gray.
d. No particular odor.
e. About 5 cu yds/month
f This by-product is produced at a very irregular rate and frequency depending on the amount of fines originally contained in the aggregate and depending on how much fine material the mix design will tolerate.

37. Attachment 31 shows a site plan with the baghouse indicated (the source of baghouse fines) and the baghouse fines temporary storage site indicated.
38. See Attachment B
39. No contracts used
40. a. Pick up requested as needed
b. Safety Kleen, Clackamas – Prior to 1999
Emerald Recycling until end of 2007
Thermal Fluids, 12533 SE Carpenter Dr. Clackamas, OR
March 2008 to present
c. N/A
d. Waste Oil, Anti-freeze, Solvents – See 40b
e. See 40b
f N/A
g. N/A
41. No wastes were ever disposed of in any site drains.
a. NA
b. NA
c. NA
d. NA
e. NA
42. NA
43. NA
44. NA
45. NA
46. NA
47. None.
48. NA
49. NA

Section 5.0 Regulatory Information

50. Lakeside Industries has been able to identify the following agencies that either do regulate or may have regulated the referenced property. Each identified agency is followed by the list of "interactions" that Lakeside has been able to identify. In nearly all cases, DEQ/EPA has copies of the documents and per the instructions in the Section 104(e) letter we do not need to provide copies of those documents. In certain cases, we may find it necessary to attach copies of documents that do not appear to be held

already by the agency in question. The agencies which Lakeside believes have jurisdiction over the Lakeside property and which have had or currently have some form of interaction with the owner or operator of the subject property include the following:

1) The United States Army Corps of Engineers;
2) The US Environmental Protection Agency;
3) The Oregon State Department of Environmental Quality – Portland Harbor Statement of Work; Voluntary Letter Agreement for Portland Harbor; The Portland Harbor Site Discovery Process; The Portland Harbor Sediment Management Plan
4) The City of Portland;
5) Oregon State Department of Occupational Heahh and Safety Administration (OROSHA.)
6) Oregon State Fire Marshal's Office

Regarding heahh and safety issues, the Lakeside property was inspected by OROSHA in late 1993 and 3 citations were issued. Appropriate corrections were made and the citations were closed March 20, 1994.

Please see Attachment A – Open Source Documents/Data

51. None known at this time
52. NPDES Permit (not incl), Please Attachment 4 for USACOE Permit, and Attachment A – Open Source Documents/Data
53. No
54. No
55. N/A
56. N/A
57. N/A
58. Lakeside has reported to the following federal, state and local jurisdictions under a variety of statutes and ordinances. Those statutes and ordinances are available as Open Source documents or data:

1) United States Department of the Army – Corps of Engineers – Lakeside has applied for and obtained a permit that authorizes "incidental fallback" that occurs when mineral aggregate (crushed rock and gravel) is unloaded from barges at the pier which lies over the Willamette River, a Water of the US. This permit is renewed every 5 years.
2) United States EPA – Lakeside is currently responding to an EPA Section 104(e) letter regarding the Portland Harbor Superfiind process. We are also presently engaged in the application and review process for a NPDES permit under the federal CWA.
3) Oregon State Department of Environmental Quality (DEQ) – Lakeside regularly reports to the ODEQ regarding water quality issues and grading activities on the site. Lakeside also obtains all

air emissions and air quality permits from DEQ.

4) Oregon State OSHA (OROSHA) – Lakeside is inspected by OROSHA and continues to report to OROSHA regarding heahh and safety matters ;
5) City of Portland – Lakeside has reported occasionally to the City of Portland re: questions related to the stormwater system. We believe that these questions were related to the Portland Harbor Superfund issue.

59. N/A

60. No incidents over State Aquatic Lands

61. N/A – See No. 60

Section 6.0 Releases & Remediation

62. a. **1.** 1988. Per a 1999 Oregon DEQ (ORDEQ) Site Assessment Program Strategy Recommendation document, in 1988, Lakeside Industries reported a release of diesel from an underground storage tank (UST) to ORDEQ UST section, leaking UST (LUST) #26-88-0075. The site was closed in 1989[a]. Lakeside Industries does not have record of the closure report and no further action was required by ORDEQ.

References:

a. Oregon DEQ (1999). *DEQ Site Assessment Program – Strategy Recommendation.* November 23, 1999.

2. April 30, 1998. Lakeside Industries was informed, via letter from Squire Associates, that Gunderson, Inc. was conducting a Remedial Investigation into a historical release of a solvent on its property at 4350 N.W. Front Avenue, Portland, OR 97210, contiguous with Lakeside Industries property at 4850 NW Avenue, Portland, OR 97210[a]. Lakeside Industries responded with a request to be informed of any potential for migration of the solvent release to Lakeside Industries property[b]. Subsequent site assessments conducted by Gunderson document a solvent release plume originating at the adjacent Gunderson facility and flowing beneath the Lakeside property toward the Willamette River[c].

References:

a. Squier Associates (1998). *Reasonably Likely Future Land Use.* April 30, 1998.
b. Letter from Lakeside Industries (1998). *Reasonably Likely Future Land Use.* May 15, 1998.
c. EPA SDMS Document ID Nos: 1188566, 1188548, 1188549.

3. September 2003. Hahn and Associates, Inc. (HAI) conducted underground injection control (UIC) decommissioning activities for two drywells (UIC#1 and UlC#2) located on the Lakeside property

September 30, 2003[a,b]. Based on analytical testing of soil samples, an undetermined release of diesel and oil-type petroleum hydrocarbons to soils was identified at U1C#1. Subsequent testing of groundwater from a push probe boring in the vicinity of U1C#1 indicated diesel and oil-type petroleum hydrocarbons and PAHs present in groundwater[h]. Since no contamination was found in the vicinity of U1C#2, HAI finalized decommissioning of UIC#2 and submitted a UIC Closure report to ORDEQ[c]. In Febmary 2004, two groundwater monitoring wells were installed adjacent to U1C#1 and sampled to investigate the extent and source of contamination from UIC#1. The remediation activities and sampling resuhs were submitted to ORDEQ in the form of a closure report[d].

ORDEQ approved formal closure of U1C#1[e].

In a January 18, 2005 letter, ORDEQ raised concems regarding UIC#2 and a sump located within a service bay of the Tmck Shop at the property and questioned the possibility of four additional U1Cs (drywells) allegedly identified by the ORDEQ UIC Program in a 1988 site plan for the property. As a resuh HAI developed a Work Plan for Site Investigation Activities to address ORDEQ's concems[f]. The site investigation findings were documented and submitted to ORDEQ on May 5, 2005[g]. The investigation indicated that there are no additional U1Cs located on the property; detection of HVOCs in groundwater is attributed to the degradation of the TCA plume originating on the Gunderson property; and UIC#2 and the Tmck Shop do not appear to have impacted groundwater to an extent that would justify further investigation and/or other actions[g,h,i].

References:

a. Hahn and Associates, Inc. (2003). *Class V UIC Pre-Closure Notification, Lakeside Industries-Portland, OR Facility* (HAI Project No. 6235). August 28, 2003.-Attachment 15
b. Hahn and Associates, Inc. (2003). *UIC Release Report, Lakeside Industries, 4850 NW Front Street, Portland, Oregon* (HAI Project No. 6235, UIC File No. 11774). November 12, 2003. Attachment 16
c. Hahn and Associates, Inc. (2004). *UIC Closure Report, Lakeside Industries, 4850 NW Front Street, Portland, OR* (HAI Project No. 6235). March 18, 2004.-Attachment 18
d. Hahn and Associates, Inc. (2004). *UIC #1 Closure Report, Lakeside Industries, 4850 NW Front Street, Portland, OR* (HAI Project No. 6235). June 13, 2004.-Attachment 19
e. ORDEQ (2008). ORDEQ UIC Database Report for UIC No. 11774. May 2, 2008. – Attachment 26
f Hahn and Associates, Inc. (2005). *Work Plan for Site*

Investigation Activities, Lakeside Industries Facility, 4850 NW Front Avenue, Portland, Oregon (HAI Project No. 6235). February 16, 2005. – Attachment 22

g. Hahn and Associates, Inc. (2005). *Summary of Findings from April 2005 Site Investigation, Lakeside Industries, 4850 NW Front Avenue, Portland, Oregon* (HAI Project No. 6235). May 5, 2005. – Attachment 23

h. Squier|Kleinfelder (2005). *Review Comments for the Memorandum Entitled, "Summary of Findings from April 2005 Site Investigation, Lakeside Industries, 4850 NW Front Avenue, Portland, Oregon", dated May 5, 2005.* September 26, 2005. – Attachment 24

i. Hahn and Associates, Inc. (2005). *Response to Comments Contained in Squier|Kleinfelder Memorandum, Dated September 26, 2005, Lakeside Industries, Portland, Oregon* (HAI Project No. 6235). October 26, 2005. – Attachment 25

4. March 25, 2008 (05:00-12:00). Below ground release of 117 gallons of uncontaminated 50W motor oil from a feed line located approximately 3 feet below ground surface beneath office/maintenance shop building. The ruptured feed line ran below-ground between an above-ground storage tank and a repair shop work pit located inside the office/shop building. The incident, response, and remediation activities were documented in a Spill/Release Report prepared by HAI April 14, 2008[a].

References:

a. Hahn and Associates, Inc. (2008). *Spill Release Report OERS No. 08-0755, Lakeside Industries, Portland, Oregon.* April 14, 2008. – Attachment C

b. See Response 62.a and associated references attached.
c. See Response 62.a and associated references attached.
d. See Response 62.a and associated references attached.
e. See Response 62.a and associated references attached.
f. See Response 62.a and associated references attached.
g. See Response 62.a and associated references attached.
h. See Response 62.a and associated references attached.

63. a. See Response 62.a.3 and associated references attached.
b. See Response 62.a.3 and associated references attached.
c. See Response 62.a.3 and associated references attached.
d. See Response 62.a.3 and associated references attached.
e. See Response 62.a.3 and associated references attached.
f. See Response 62.a.3 and associated references attached.
g. See Response 62.a.3 and associated references attached.

64. a. See Response 62.a.1, 3, and 4 and associated references attached.
b. See Response 62.a.1, 3, and 4 and associated references attached.

c. See Response 62.a.1, 3, and 4 and associated references attached.
d. See Response 62.a.1, 3, and 4 and associated references attached.
e. See Response 62.a.1, 3, and 4 and associated references attached.
f See Response 62.a.1, 3, and 4 and associated references attached.
g. See Response 62.a.1, 3, and 4 and associated references attached.
h. See Response 62.a.1, 3, and 4 and associated references attached.
i. See Response 62.a.1, 3, and 4 and associated references attached.
j. See Response 62.a.1, 3, and 4 and associated references attached.

65. See Response 62.a.2 and 3 and associated references attached.

66. a. See Response 62.a.2 and associated references attached.
b. See Response 62.a.2 and associated references attached.
c. See Response 62.a.2 and associated references attached.
d. See Response 62.a.2 and associated references attached.
e. See Response 62.a.2 and associated references attached.

67. No.
a. NA
b. NA
c. NA
d. NA
e. NA

68. NA

69. NA

Section 7.0 Property Investigations

70. Lakeside is not aware of any inspections, evaluations, safety audits, correspondence or any other documents associated with insurance conditions or coverage.

71. In early 2008, Lakeside retained Hahn and Associates of Portland, Oregon to complete a geotechnical study (including a series of borings) in voluntary response to a minor oil line leak. Documents related to the Hahn study are attached in Attachment XXX. Numerous, very detailed investigations have been carried out on the site related to the Gunderson solvent spill from 1983 (?) See Hahn documents (Attachment XXX) and Gunderson Documents (Attachment XXX.) Also see other Open Source Documentation (Attachment XXX.)

72. Lakeside voluntarily reported and responded to a minor oil spill (leak in line) in early 2008 (see 7.0 – 71) Also see documents attached under 7.0-71. ADEQ documents attached.

73. a. At this time, no new investigations are contemplated. Hahn and Associates are continuing to prepare the draft Source Control Document and are monitoring GW wells on Lakeside property related to the Gunderson solvent spill.
b. N/A
c. N/A
d. N/A
e. N/A

Section 8.0 Corporate Information

74. a. Corporation
b. Lakeside Industries, Inc.
P.O. Box 7016
Issaquah, WA 98027

Rhoady Lee, JR, Chairman of the Board
Larry Damell, Assistant Chairman
Timothy Lee, CEO
Michael Lee, President
Henry Waggoner, Secretary-Treasurer/CFO

c. Lakeside Industries became incorporated on 7/1/2008
d. Lakeside Industries – Asphalt Plant
4850 Front Ave
Portland, OR 97210
e. N/A

75. a. Lakeside Industries, Inc.
P.O. Box 7016
Issaquah, WA 98027

b. Rhoady Lee, JR, Chairman of the Board
Larry Damell, Assistant Chairman

Timothy Lee, CEO	(425) 313-2600
Michael Lee, President	(425) 313-2600
Henry Waggoner, Secretary-Treasurer/CFO	(425) 313-2600
John White, Registered Agent	(425) 313-2600
Chuck Gaskill, Division Manager	(503) 222-6421

c.

Division 010	2400 Sargent Blvd Aberdeen, WA 98520	Bob Glenn	Manager	360-533-0610
020	8705 NE 117th Ave Vancouver, WA 98662	John Baumgardner	Manager	360-892-5410
030	6505 226th Place SE Issaquah, WA 98027	Jim Wiedman	Manager	425-313-2600
040	163 Eclipse Ind. Pkwy Port Angeles, WA 98363	George Peabody	Manager	360-452-7803
050	11497 Havecost Road Anacortes, WA 98221	Rod Gilmore	Manager	360-293-2168
060	14593 Galaxy Way Monroe, WA 98272	Gail Land	Manager	425-743-1289
070	11125 Durgin Rd SE Olympia, WA 98513	Dean Smith	Manager	360-491-5460
080	500 Tennant Way Longview, WA 98632	Ron Green	Manager	360-423-6882
110	4850 NW Front Ave Portland, OR 97210	Chuck Gaskill	Manager	503-222-6421
120	18808 SE 257th Covington, WA 98042	Rob Dennis	Manager	206-343-7375

76. State of Oregon Constmction Contractors Board License Number 108542
City of Portland Business License Number 136281

(copies enclosed)

77. a. N/A
    b. N/A
    c. N/A
    d. N/A
    e. N/A
    f. N/A

78. Lakeside Industries was a Joint Venture of Corporations until 6/30/2008 Incorporated on 7/1/2008.

Section 9.0 Compliance with this Request

79. a. Bill Dempsey – Production Manager
    Chuck Gaskill – Portland Division Manager
    Dax Woolston – Controller
    Forest Lane - Environmental Manager
    Hahn & Associates, Portland, OR
    Hank Waggoner - CFO
    James Hatch - Director of Permits & Land Use
    Karen Garnes – (former) Environmental Assistant
    Kimberly Milan – Executive Asst
    Linda Eichler – GL Dept
    Mike Lee - President
    Pat Dunigan – Portland Plant Foreman
    Ryan Anderson – Assistant Controller
    Tim Lee - CEO
    b. Documentation is kept at Lakeside Main Office or Portland Division Office
    c. After receipt of this document until present.

80. See question 38

81. a. Lakeside retains information as required by law.
    b. N/A
    c. N/A
    d. N/A
    e. N/A

82. Lakeside's business & environmental records that pertain to this issue are available for inspection by EPA personnel. Lakeside Industries has endeavored to provide all documentation that is responsive to your request.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on August 14, 2008.

Signature

James Hatch

Type or Print Name

Director - Regulatory/Permits

Title

Mailing Address:

Lakeside Industries
P.O. Box 7016
Issaquah, WA 98027